



RESPONSE TO COMMENTS

City of Driggs
Permit Number ID-002014-1

A draft National Pollutant Discharge Elimination System (NPDES) permit for the City of Driggs Wastewater Treatment Plant was issued for Public Notice on April 27, 2001. The original comment period was scheduled to close May 29, 2001 but was extended 15 days (to expire June 13, 2001). Public notice of this extension was mailed to interested parties and published on May 28, 2001 in a local newspaper (The Standard Journal).

The Environmental Protection Agency (EPA) received written comments from the permittee dated June 10, 2001. This Response To Comments document is a summary of the significant comments related to the draft NPDES permit and the EPA's responses. The Section of the permit the comment refers to is identified in parentheses at the end of the comment. The Idaho Department of Environmental Quality (IDEQ) issued a final 401 certification dated July 23, 2001. The certification conditions are included herein.

1. **Comment.** The City requests that the sampling frequency for bacteria and chlorine be reduced. The basis for the request for decreased monitoring is that 1) the labs in the area only except samples Monday through Thursday 2) the increased monitoring cost would create a financial burden 3) it is logistically difficult to deliver fecal coliform and E. coli samples to the laboratory within six (6) hours of sampling (Section I.A1)

401 Certification condition. The fecal coliform monitoring frequency should be changed from five samples per week to five samples per month. It is improbable that the city can transport samples to the independent laboratories serving the area on the draft schedule found in the State's Water Quality Standards. These laboratories only provide bacteria testing four days per week and are difficult to reach during the winter due to poor road conditions. In addition, the labor, testing and transportation cost of the five samples per week would be a financial hardship to the City.

Response. The monitoring frequencies in the draft permit for chlorine are consistent or less stringent than those found in other similar NPDES permits and have therefore been retained in the final permit.

The EPA established the draft monitoring frequency for fecal coliform based on Idaho Water Quality Standard IDAPA 18.01.02.420(05)(a). This standard requires that fecal coliform in sewage wastewater treatment plant effluent not exceed a geometric mean of two hundred/one hundred ml (200/100 ml) based on no more than one week's data and a minimum of five samples. However, the monitoring frequency for fecal coliform in Section I.A.1 has been decreased to five samples per month, consistent with Idaho's final 401 certification that this

would comply with their standards.

2. **Comment.** The draft effluent limits for chlorine are significantly more stringent than the previous permit's limits and would create a financial burden on the City due to the need for de-chlorination. The City requests an increase in the chlorine residual limit. (Section I.A.1).

401 Certification condition. A five year compliance schedule for total residual chlorine effluent limits should be provided. This time will allow the City to make any operational adjustments that are necessary, install a dechlorination system, and/or to monitor surface water to determine if a mixing zone could be established.

Response. The draft and final effluent limits for total residual chlorine are based on meeting Idaho's approved water quality standards for the protection of aquatic life in Woods Creek and the Teton River. Flow data is not available in either the drainage ditch or Woods Creek and therefore a mixing zone (i.e., zone of dilution) cannot be used to calculate less stringent chlorine limits. Flow monitoring in the drainage ditch is required in the permit in order to determine if a mixing zone is available when the permit is reissued.

Although less stringent chlorine limits are not possible, the Idaho Department of Environmental Quality has provided the City of Driggs a five year compliance schedule for their more stringent water quality-based limits. Section I.A.6 has been added to the final permit that allows the City five years to come into compliance with its effluent limits. The City must submit Progress Reports to EPA and IDEQ by January 31st of each year that outline the progress made towards compliance with the final effluent limitations.